

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

In re: Pamela Gwen Watson

Chapter 13  
Case No. 22-60700

Debtor(s)

**ANSWER OF DEBTOR TO TRUSTEE'S MOTION TO DISMISS**

COMES NOW the Debtor, Pamela Gwen Watson, by counsel, pursuant to Rule 7012 of the Bankruptcy Rules, for the Debtor's answer states as follows:

1. Defendant hereby admits the allegations in paragraph 1 of Plaintiff's Motion.
2. Defendant hereby admits the allegations in paragraph 2 of Plaintiff's Motion.
3. Defendant hereby admits the allegations in paragraph 3 of Plaintiff's Motion.
4. Defendant hereby admits the allegations in paragraph 4 of Plaintiff's Motion.
5. Defendant hereby admits the allegations in paragraph 5 of Plaintiff's Motion.
6. The document speaks for itself and therefore no answer is required, but to the extent that an answer is required, Defendant hereby denies the allegations in paragraph 6 of Plaintiff's Motion.
7. Defendant hereby denies the allegations in paragraph 7 of Plaintiff's Motion
8. The allegation in paragraph 8 of Plaintiff's Motion are statements of law that do not require an answer, but to the extent that an answer is required, Defendant hereby denies the allegations in paragraph 8 of Plaintiff's Motion.
9. Defendant hereby denies the allegations in paragraph 9 of Plaintiff's Motion, and in support thereof attaches hereto and incorporates herein as "Exhibit A" a letter and supporting

documents provided to the Plaintiff explaining what happened regarding the replacement of her 2013 Ford F-150.

10. Defendant hereby admits the allegations in paragraph 10 of Plaintiff's Motion.
11. Defendant hereby admits the allegations in paragraph 11 of Plaintiff's Motion.
12. Defendant hereby admits the allegations in paragraph 12 of Plaintiff's Motion.
13. Defendant hereby admits the allegations in paragraph 13 of Plaintiff's Motion.

WHEREFORE, Debtor, PAMELA GWEN WATSON, requests that the Motion be dismissed and that the Defendant(s) be awarded the costs expended in this action.

Respectfully Submitted,

PAMELA GWEN WATSON

By Counsel

/s/ Marshall M. Slayton  
Marshall M. Slayton  
SLAYTON LAW, PLC  
913 East Jefferson Street  
Charlottesville, VA 22902  
Counsel for Defendant(s)

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing Answer was sent via first-class mail, postage prepaid, to Debtor(s) and via ECF to counsel for Plaintiff and the Trustee on 7/11/2023.

/s/ Marshall M. Slayton  
Marshall M. Slayton